

**Statement of
California Urban Water Agencies
to the
State Water Resources Control Board
at its
Fourth Workshop to Review Standards for
San Francisco Bay/Sacramento-San Joaquin Delta Estuary
July 13, 1994**

California Urban Water Agencies (CUWA) is an organization of the largest urban water providers in California, who serve about two-thirds of the state's 32 million people. Through CUWA, these metropolitan water agencies have joined to work on water resources issues of common concern. The number one issue that occupies the major urban water providers is supply reliability. The major urban agencies all believe that an appropriate comprehensive solution to Delta problems is currently the single largest factor influencing state-wide water supply reliability.

CUWA appears before the State Board today to comment on, and make some recommendations on Question No. 1 regarding the Board's development of Bay-Delta standards. First we identify the scope and purposes of this testimony. We will comment briefly on the technical work completed or currently under way by CUWA and among CUWA and other interested groups. Because some of that work is nearing completion, but is not yet ready for presentation, we request a fifth Board Workshop as an opportunity to present the results publicly. Finally, we have some specific recommendations to offer.

In response to the recent proposal by the Environmental Protection Agency (EPA) to implement a salinity standard for the San Francisco and San Joaquin Estuary, CUWA conducted an intensive review of data and information that formed the basis of the proposed EPA standards. The collective work products that were generated as a result of this analysis have been made available to the State Board and to all parties interested in the technical work conducted by CUWA. In addition, CUWA technical specialists have conducted several review sessions with representatives from other water interest groups including various state

and federal resource agencies to discuss the overall results of CUWA's analysis, concerns with CUWA's proposals, and recommendations for further studies.

CUWA's work earlier this year resulted in presentations of an "Urban Alternative" to the EPA standards proposal which would provide equivalent biological protection with lower water supply risks. We have continued to refine the Urban Alternative. This work is nearing completion (thus the request for an August Workshop of the State Board). Our extensive review work also led to a joint science review with representatives of environmental organizations. EPA and several other federal and state agencies were present at these joint science review sessions, and made helpful contributions. A report on the findings of the joint Urban-Environmental science review process is being completed this week and will be provided to the State Board and EPA very soon. This joint review process was constructive and productive, and may be used further in the current Bay-Delta process.

Concurrently, representatives from urban and agricultural water interests have conducted discussions of Bay-Delta standards, and the importance of comprehensive planning and action in the search for a responsible Delta "fix" which can be implemented and have appropriate "shelf-life." The Association of California Water Agencies (ACWA) has hosted these Urban-Ag discussions. Yesterday's letter from Steve Hall to your Board identifies this work and the need for a fifth Board Workshop.

CUWA members are pleased with the results so far of our consensus efforts on Bay-Delta issues. Of course there is more to be achieved, and our efforts will continue. We are gratified that the areas of agreement among urban, agricultural, and environmental interest groups are numerous. These important areas of agreement may not be expressed in joint testimony, but you will hear about them from each of these parties to your proceedings. Take this as evidence that this is a new day in California water -- one in which all responsible parties demand an equitable, environmentally-responsible solution to Delta issues.

To the main focus of this workshop, California Urban Water Agencies recommends that the State Water Resources Control Board:

- 1. Adopt a comprehensive ecosystem protection plan for the Bay-Delta as part of this proceeding.**

- 2. Propose and adopt, on the schedule set by you for this proceeding, a Bay-Delta Water Quality Plan. This Plan (standards) should be adopted as an element of the comprehensive ecosystem protection program. The water quality plan should provide equivalent biological benefits to the EPA proposal, as modified, and should include (a) a salinity-based estuarine habitat standard expressed in terms of salinity, or outflow, or a combination of these; (b) a sliding scale application with features to mitigate water supply risks; and (c) a goal for improvement of salmon smolt survival. Further details of a recommended water quality standard will be submitted to the State Board, preferably at a fifth workshop in August.**

- 3. Codify its intent to establish the role of factors other than Delta outflow in the health of the estuarine ecosystem, and implement balanced programs which require improvements in all important factors. CUWA's continuing research efforts will contribute to a more thorough understanding of the influence of other factors and will assist the State Board in developing a program for the regulation of these other factors.**

- 4. Establish appropriate project operational controls and requirements.**